

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION CHART UNDER P.R. 4-5(d)

Pursuant to Local Patent Rule 4-5(d), Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) jointly submit this Joint Claim Construction Chart containing the agreed and disputed claim term, phrase, or clause of U.S. Patent No. 9,647,918 (“’918 patent”). A chart identifying the parties’ disputed constructions is attached as Exhibit A, listing the complete language of claims with terms in bold type and separate columns for each party’s proposed construction, pursuant to P.R. 4-5(d). The parties have not agreed upon any constructions.

Dated: March 21, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on March 21, 2025, with a copy of this document via the Court's CM/ECF.

/s/ Marc Fenster

Marc Fenster